

REMARKS

Claims 10-12 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Bennett et al., claims 1, 13, 15, 19, 21 and 22 stand rejected under 35 U.S.C. § 102(e) as being anticipated by King (U.S. Patent Number 6,532,446), claims 23 and 25 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Mohan (IEEE VTC 2000), claims 3-6 and 16-18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over King in view of Mohan, claims 2, 7 and 9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over King in view of Dahm et al. (U.S. Patent Number 6,466,783, hereinafter "Dahm"), claims 8 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over King in view of McAllister et al. (U.S. Patent Number 6,101,242, hereinafter "McAllister"), claim 20 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over King, and claim 24 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Mohan. Although the applicants respectfully disagree with these rejections, the applicants have specifically amended the claims to more clearly express the invention. Specifically, claims 10-12 and 23-25 have been canceled and independent claims 1, 7, 13, and 19 and 22 have been amended to more clearly define the term "voice recognition information" in those claims.

In claims 1, 7, 13, 19 and 22, voice recognition information is recited as comprising a **context model and training parameters related to a voice of a user**. Independent claims 1, 7, 13, 19 and 22, all describe the voice recognition information as being **stored in a wireless communication device and then being transmitted to the wireless system infrastructure**. The Examiner cites Mohan as teaching context models and training parameters. However, Mohan clearly teaches voice recognition functionality stored in and performed by the mobile device. See the *System Architecture* section on Mohan page 2737. The applicants do not see any teaching or suggestion of transferring a context model / training parameters to a wireless system infrastructure in Mohan.

The Examiner cites King column 5, lines 7-15 as teaching the transmission of voice recognition information to the wireless system infrastructure. King column 5, lines 7-15 reads (emphasis added):

Access to the voice communication channel generally requires that the user and/or device be recognized by wireless carrier network 104. Network recognition involves the exchange of identification information between a subject mobile device and wireless carrier network 104. Generally, the identification information for the user and/or mobile device in question is stored in the memory of the device and is transmitted automatically when the user attempts to access the network.

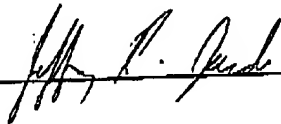
However, clearly King is not teaching the storing and transmission of context model / training parameters information from the mobile to the infrastructure. Instead, King teaches mobile identification signaling with the carrier network, a very common practice, long well-known in the art.

The Examiner asserts that since "King and Mohan are analogous art because they are from the same field of endeavors, it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify King by incorporating the teaching of Mohan in order to enhance speech recognition accuracy at the server." See e.g. page 8 and 9 of the present office action. However, Mohan teaches performing speech recognition at the mobile. Thus, the applicants submit that enhancing speech recognition accuracy at the server is not a motivation to combine these references. Moreover, the applicants do not see any motivation in the references themselves for a combination that would result in sending context model / training parameters information to the infrastructure. King teaches sending identification information and Mohan teaches performing speech recognition at the mobile. Therefore, the applicants ask that the Examiner cite a motivation for combining these references and explain how these references when combined would result in the functionality claimed.

Since the references cited do not teach all of the limitations of base claims 1, 7, 13, 19 and 22, or therefore, all the limitations of their dependent claims, the applicants assert that the Examiner has not shown anticipation nor made a prima facie case for obviousness. No remaining grounds for rejection or objection being given, the applicant now respectfully submits that the claims in their present form are patentable over the prior art of record, and are in condition for allowance. As a result, allowance and issuance of this case is earnestly solicited.

The Examiner is invited to contact the undersigned, if such communication would advance the prosecution of the present application. Lastly, please charge any additional fees (including extension of time fees) to Deposit Account No. 502117 -- Motorola, Inc.

Respectfully submitted,
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